

STATE OF MICHIGAN DEPARTMENT OF INFORMATION TECHNOLOGY LANSING



February 25, 2008

The Honorable Bill Hardiman State Senator P.O. Box 30036 Lansing, Michigan 48909-7536

Dear Senator Hardiman:

As requested, here are the Departments of Information Technology, Management and Budget, Community Health and Humans Services responses to the Auditor General's letter regarding the Bridges project. We have also included responses to the five issues/questions raised during the February 12, 2008 Joint Senate Committee of the Senate Appropriations Subcommittee on DHS and the Standing Committee on Families and Human Services.

If you have any questions or need any additional information, please do not hesitate to contact us.

Sincerely,

David L. Newman Legislative Liaison

MDIT

Ron Hicks

Legislative Liaison

DHS

Bob Burns

Legislative Liaison

DMB

Area	Letter Language	Response
Background	The Department of Human Services (DHS), Department of	N/A
Information	Community Health (DCH), and Department of Information Technology (DIT) are developing a new social services system called Bridges Integrated Automated Eligibility Determination System. Bridges will replace several existing systems that process intake, registration, eligibility determination, and issuance of financial assistance, medical assistance, food assistance, and child care assistance. The Departments' primary goal for Bridges is to reduce caseworker workload to maximize worker effectiveness and efficiency. Additional goals of Bridges are to improve service delivery to clients of assistance programs and to	
	 Plans to develop and implement Bridges in three releases: Release 1 will provide worker relief and increased efficiencies. This release will replace three legacy systems (ASSIST, 1042 and CMC). 	N/A
	register clients for programs, determine program eligibility, determine benefit amounts, and provide ongoing case management.	
	replace all remaining assistance program systems (including the payment systems) residing on mainframe computers. Release 3 will provide client self service, such as the	
	submission of applications over the Internet, and improve caseworker production. This release will also provide referrals for additional assistance programs not included in Release 1 and 2 such as Special Supplemental Food Program for Women, Infants, and Children (WIC).	
	Team (consisting of 3 executives, one each from DHS, DCH, and	N/A
	to direct the day-to-day activities of the Bridges project and to coordinate development and implementation activities to ensure	
	successful implementation of Bridges. Currently, the PMO consists of 6 consultants. The PMO is primarily managed by 1 of	
	the 6 consultants, in conjunction with the Executive Leadership Team. The total contract amount, including purchase orders, for the PMO consultants from Monagers.	
	SI 8007 Individual Individual East Mark III Programmer 2008 IS	

The base TIERS system have been successfully	
Bridges is automated eligibility determination and does not include a call center technology	
After three year trail, Texas reverted to case worker model and is aggressively pursing a state-wide implementation	
Texas subsequently passed House Bill 2292 which created change in their Department of Human Services operational model going from as case worker centric to call center centric model	October 2007, the Texas State Auditor's Office issued an audit report on TIERS. The audit cited architectural design and development methodology problems with TIERS. We did not conduct fieldwork to determine what, if any, impact these problems will have on Bridges.
Michigan DHS cases workers and technical staff spent one day observing their Texas counterparts use the TIERS system	the pilot. Some of the problems were related and other problems stemmed from a reorganization of the Texas Department of Human Services, a call center add-on to the system, and outsourcing of personnel to a private company. Furthermore, in
TIERS was implemented in two pilot counties	report that identified functional problems with the system during
process - Obtained Federal approval	implemented in Texas. The system has been in pilot in two Texas counties for 4 years. In April 2007, the Texas Health and Human
 Site visits of four states Contract award via competitive bid 	Determination System (TIERS). DHS has stated that Bridges is
 Vendor interviews and demo State interviews 	Consulting is developing Bridges based on a system it developed
We followed a one year extensive planning process that included: - A request for information (REI)	Consulting LLP for the development and implementation of Bridges. The total contract amount for Deloitte Consulting from
	system; therefore, state visits were conducted in only 4 of the 5 states.
	site visits in 4 states to review the systems proposed by 4 of the vendors. DIT informed us that 2 vendors hid the same base
NA	and bids for the development and implementation of Bridges. They received proposals and hids from 5 yearders and conduct to the control of the conduct to t
	EDS from October 2005 through October 2009 is \$22.0 million.
	the project schedule and scope for the development and
NA	Data Systems (EDS) to run the Bridges project control office. The
	In October 2005 Due 1907

a ka ka ka			In addition, DHS and DIT informed us that, during spring 2007, State and federal legislative changes impacting the existing legacy systems further delayed the implementation schedule. As of August 2007, the implementation schedule indicated a plan to pilot Release 1 in November 2007 with Statewide implementation in March 2008. Full implementation of all releases of Bridges is scheduled for October 2009.	Ine original implementation schedule for Bridges included a pilot for Release 1 in Barry, Eaton, and Calhoun counties in June 2007 with Statewide implementation in January 2008. However, in July 2006 DHS expanded the scope of Release 1 to include some Release 2 requirements, delaying the implementation.	
Toocal occillation	programs (JEI) and 2007 budget reduction act. 3. Resource constraints 4. To reduce risk to the legacy payment systems strategy was changed to expand the scope of Release 1. We are targeting a window between June and August to deploy the pilot in Barry-Eaton Counties and Calhoun County Offices. However, conditions to meet dates: 1. No new legislative mandates that impact legacy or the Bridges Pilot. 2. No new DHS, DCH, DLEG policies that affect the application. 3. Agency and other partners hit their targets 4. Other "Go-Live" criteria is met	Have experienced delays for the following reasons: 1. We had to stabilize legacy systems to ensure payments to DHS customers 2. Unanticipated/unplanned state and federal legislative mandates, i.e., family self service		oilot 2007 July	

		needed. We are evaluating the needs and we will report back within a month. Looking at changes that may be needed for pilot and
	Bridges will include approximately 2,000 decision tables and 400 screens.	N/A subsequent waves.
	As of July 2007, expenditures for the development of Bridges were \$30.0 million. DHS informed us that total project costs for	N/A
	the development and implementation are estimated at \$140 million for fiscal years 2004-05 through 2009-10	
Project Oversight	The Executive Leadership Team, consisting of an executive from DHS, DIT, and DCH, sponsors the Bridges project and has	N/A
and Mngmt Practices	authority for the project, including approval of project strategies, resource utilization, budget decisions, and vendor deliverables.	
	day-to-day activities of the Bridges project and to coordinate	
	development and implementation activities to ensure successful implementation of Bridges Currently, the DMO consists of a	
	consultants (initially 7 consultants); the Executive Leadership	
	serve as program and project managers, his increases	
	specialists, and system architects.	
	In our review of the project oversight and management practices,	N/A
	which could impede the successful completion of the project	
	During our preliminary review, we made the following observations:	
	 DHS and DIT have not defined the detailed roles. 	Based on their broad experience in large information
	responsibilities, and authorities of the PMO. This may impede DHS and DIT's efforts to provide effective oversight to hole	technology implementation projects, we ask these
	ensure the successful development and implementation of	basis.
	effectiveness of the consultant's performance and hold the	However we page the relative to the rest t
	consultants accountable for their work.	could have been better defined in the Statement of Work
	that the detailed roles consultants, we were informed	
*	defined in the statements of work within the consultant's	We have taken pro-active steps, and are currently working to address these issues
	contracts. However, our review of 11 statements of work for	
	not include enough detail to clearly identify the roles and	
	responsibilities to be performed throughout the Bridges	
	Project. Also, DHS and Dil used general terms such as	

See attachment for further detail.	Will nave different expectations of the benefits of Bridges.	
In addition the current systems used to determine eligibility are over 25 years old and using unsupported technology. It is critical that the business functions processed by these computer applications are migrated to a system that will be sustainable for the next 10 years	For example, DHS and DIT defined the primary goal of Bridges as "reduce workload to maximize worker effectiveness and efficiencies" and the associated objective as "improve caseworker ability to serve the client". However, DHS and DIT did not define to what extent it will reduce workload nor define steps needed to accomplish a reduced workload. Without defining what is meant by these goals and objectives, users	
more cost effective and timely Decreased financial penalties for error rates (i.e., misissuance). Eliminates high cost error prone manual activity and calculations	 DHS and DIT did not clearly define the project goals and objectives. In addition, DHS and DIT did not define performance measurement methodology and criteria needed to evaluate their success or failure at meeting the project goals and objectives. Without well-defined goals and objectives a project may lack clear purpose and may fail to meet business and user needs and expectations. 	
The Cost Benefit Analysis (CBA) as submitted and approved by the federal government contains very specific, quantifiable results (i.e., benefits) to be obtained. They address four areas: Increased worker productivity Modification and routine maintenance will be much	DHS and DIT defined 3 goals and 8 objectives for Bridges. Goals are high-level statements that identify realistic and attainable outcomes to be achieved by a project. Objectives are strategies and activities that will lead to the achievement of a goal. Clearly defined objectives should be specific, measurable, and time oriented. Performance measurement methodology and criteria identify how and what will be assessed to determine if goals and objectives have been met. During our preliminary review, we noted the following observation:	Goals and Objectives
Two of these contracts have already completed their tasks leading to contract termination. The remaining contracts will expire this year and will not be extended.	included contract extensions and they do not believe estimated budgeted costs for the Bridges project will increase.	
Funds were budgeted for these services through 2010 as approved by the feds. The state competitively bid these as time and material contracts to give us the greatest amount of flexibility.	the full time periods for the current 6 PMO positions do not cover the full time period for the development and implementation of Bridges. Therefore, the contract costs for these consultants will likely increase as contracts are extended. Release 3 is scheduled for implementation in 2009; however, the 6 consultant contracts expire in 2008. After our preliminary review. DHS and DIT informed us that budget planning.	

Quality Assurance	Quality assurance is an independent and impartial review of the quality of work being done on a project. A quality assurance plan outlines roles and responsibilities, specific quality assurance activities, and associated measurement criteria, and helps to ensure that the work produced during the course of system development is sufficient. During our preliminary review, we noted the following observations:	We believe a number of quality assurance activities have been incorporated into project processes – e.g., configuration management, change control, issue resolution, etc. – but acknowledge these are not well documented and communicated within and outside the project organization.
	 DHS and DIT did not establish or document a quality assurance plan, independent of the PMO, over the development and implementation of Bridges. Without a quality assurance plan, DHS and DIT cannot ensure that Bridges will meet business and user needs or that development and implementation processes improve as the project continues. 	We are currently taking the appropriate steps to put this documentation and methodology in place.
	DHS and DIT informed us that quality assurance was incorporated throughout the project and is part of the PMO. DHS and DIT also informed us that quality assurance roles, responsibilities, and tasks were communicated to key PMO staff within their statements of work. However, the statements of work for the PMO consultants do not contain specific quality assurance tasks, and DHS and DIT could not provide us with an understanding of how they are incorporating quality assurance into the PMO.	
Design, Testing, and Impl Plans	At the time of our review, we noted the following observations: DCH informed us that the PMO requested DCH to forego certain critical Medicaid-related functionality within Bridges. The PMO provided DCH with a list of critical functions that will	Many of the critical functions have now been incorporated into the Pilot design.
	either not be ready or will be partially ready at implementation. Some of these functions are mandated by federal Medicaid regulations. Staff may need to perform workarounds in Bridges to process Medicaid cases.	DCH agreed to allow some critical functions to be delayed until after Pilot, so as not to impede the project schedule. This agreement included an understanding that viable 'workarounds' would be developed prior to Pilot, and the delayed changes would be incorporated in agreed upon waves of implementation.
		A comprehensive list of business process 'workarounds' and change control designs remain under discussion.
		DCH continues to monitor system design to

	identify legal or regulatory concerns, to be certain
	the system is fully implemented.
 Prior OAG audit reports cite numerous instances where the hardcopy case file was missing required documentation, such as employment and income verification and proof of citizenship. DHS' response to the audit reports indicated that Bridges would provide a solution for some documentation 	(F-2) The DHS representative believed that this solution was possible at the time he testified. He did not have detailed information to make that statement. DHS
Issues such as the functionality to maintain correspondence history, case change history, and audit trails. In addition, in June 2007, DHS informed the House Appropriations Subcommittee on Human Services that Bridges would address some case file documentation issues. However, DHS	document management solution in the Bridges application. However, the Bridges application will reduce the necessity to print documents for filing purposed.
did not include an electronic document management process in Bridges to help resolve the case file documentation issues. DHS staff will still need to maintain some documentation within the hardcopy case files. DHS informed us that an electronic document	The post Bridges paper case files are estimated to be approximately 25% of their current size. The majority of the paper currently stored is comprised of copies of notices to the client and screen prints because the
at a later time. Consequently, supporting case file documentation may still be a problem.	current systems do not provide either adequate history or audit trails. Bridges will provide the correspondence history, change history, and audit trail online so the majority of the paper case file problems are handled with Release 1 of Bridges.
 The U.S. Department of Health and Human Services (HHS) indicated to DHS that the Bridges project timeline is overly ambitious for the amount of effort the project would require. 	This is a very large system implementation. Nationally, these systems typically take 48 months. We are in month 24.
developing, testing, and implementation of releases 2 and 3 to take approximately one year each. However, we concur with DHHS that the project timeline is overly ambitious.	We agree with the feds and the OAG in the fact the schedule is overly aggressive. It was overly aggressive for the following reasons:
	 Caseworker relief of DHS staff. Programmatic penalties due to unacceptable error rates in programs such as FAP Support and costs of Legacy systems.
	Have experienced delays for the following reasons: 1. We had to stabilize legacy systems to ensure payments to DHS customers

DHS and DIT were conducting final user acceptance testing for Bridges Release 1. However, user acceptance test plans were in draft format, had not been approved by the Executive Leadership Team, and did not match system design requirements. DHS and DIT informed us that they overlapped the development of test plans and the conducting of testing to ensure project continuity. By beginning system testing before developing test plans, DHS and DIT may not discover all system and programming errors. Before implementing Bridges, DHS and DIT should complete detailed user acceptance test plans and obtain approval from Executive Leadership Team to ensure system requirements, DHS policy, and State and federal regulations are sufficiently incorporated into Bridges and tested. DHS and DIT should reevaluate development and implementation schedules and						
At the time of the analysis, this was an issue that has since been resolved. DHS, DCH and DIT have completed detailed user acceptance test plans and obtained approval from the Executive Leadership Team to ensure system requirements, DHS policy, and State and federal regulations are sufficiently incorporated into Bridges and tested.	See attached letter from Ollice Holden, Regional Administrator USDA.	Additional monetary resources may be needed. We are evaluating the needs and we will report back within a month. Looking at changes that may be needed for pilot and subsequent waves.	1. No new legislative mandates that impact Legacy systems or the Bridges pilot. 2. No new DHS, DCH, DLEG policies that affect the application 3. Agency and other partners hit their targets 4. Other "Go-Live" criteria is met	We are targeting a window between June and August to deploy the pilot in Barry-Eaton Counties and Calhoun County Offices. However, conditions to	 Resource constraints To reduce risk to the legacy payment systems strategy was changed to expand the scope of Release 1. 	 Unanticipated/unplanned state and federal legislative mandates, i.e., family self service programs (JET) and 2007 budget reduction act

	revises, if necessary, the time needed to complete and implement test plans	
	DCH informed us that DHS and DIT had not provided DCH	
	with adequate test files from the user acceptance test	This has been an challengee since the start of this
	have adequate time to test the interface between Bridges and	project due to competing demands for the same staff
	the Medicaid Management Information System (MMIS) prior	CHAMPS.
	to implementation of Bridges. Testing by DCH is important to	•
	8. 2007, none of the 179 test cases had paged tree.	DHS, DCH and DIT leadership meet weekly to
	acceptance testing.	illidgate issues.
	DHS and DIT anticipate, as stated in the Bridges	We are now able to identify the discrepancies
	development and implementation contract, that client benefit	between the current benefit amount and the Bridges
	equal benefit amounts calculated by Bridges. The	computation.
	development and implementation contract states that DHS	A communication plan is being developed to ensure
	plans to use current system benefit amounts after the Bridges	DHS clients and staff are aware of potential
	than determine the correct benefit amount DHS and DIT	increases/reductions in benefit amounts once
	should include, as part of their conversion and	
	implementation tasks, a process to identify discrepancies	
	between the current benefit amount and the Bridges-	
	problems or pre-existing case problems.	
	The PMO had not developed complete implementation plans	Go live criteria has been developed and agreed to by
	and nad not determined the acceptable number and type of	Deloitte, EDS, DHS, DCH and MDIT.
	implementation. Without complete implementation plans	Daily and workly mostings are conducted to seem
	DHS and DIT may implement Bridges before deficiencies are	that all the tasks are successfully completed and
	corrected. After our preliminary review, DHS and DIT	issues resolved before all parties agree to put the
	informed us that they have an approved agreement between	application into pilot.
	identifying the types and numbers of defects acceptable for	
Pridage	implementation.	
Consultant	Bridges PMO along with Executive Londonship Town and State	N/A
Contracts	staff. The role of the PMO is to direct the day to day activities of	
	the Bridges project and to coordinate development and	
	Implementation activities to ensure successful implementation of	
	conjunction with the Executive I eadership Toom Wife Executive I	
	11 contracts for 7 consultants and made the following	
	observations:	

that certain consultants worked under personal service have occurred in the past few years and MOLT will
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		missing fr	o DHS and Managen adequate			
		evaluators, consultant scores, and review notes were missing from the consultant contract files.	DHS and DIT, in conjunction with the Department of Management and Budget (DMB), did not maintain adequate contract documentation. The names of bid	DHS and DIT did not competitively bid one PMO contract. As a result, DHS may not have obtained the best price for services and the most qualified consultant. This contract totaled \$717,616.		
As a result of our own internal review and an OAG audit, DMB has instituted a comprehensive process to produce and maintain complete contract files and file integrity; this process includes ongoing internal audits of procurement files.	2) The OAG referenced missing information related to the START consultants. All of the files related to consultants, who were hired through the START process, have been located since the OAG inquiry. DMB acknowledges that we did not have documentation transmitted by DHS for one consultant's file at the time of the inquiry.	1) In relation to the vendor contracts, such as the contract with Deloitte, the OAG pointed out that we do not have site visit and buyer notes within the file. The OAG did not understand that we do not normally keep the notes they referenced. This includes the PCO vendor file (EDS) and the main implementation vendor file (Deloitte). This information is included in the final bid synopsis document. This bid synopsis was available for OAG review.	There are two processes that the OAG references in their letter:	While it is true that this contact was not bid, the rates, experience and educational background that this individual had were comparable to the other individuals that were of the same job description that were hired through the START program	As required by law the requests for amendments were presented to the State's Administrative Board for approval which was granted in May of 2005.	Reduction & Critical Project Continuity" effort. This effort concluded with changes to the START program to extend the duration to 3 years. The Bridges PMO contracts and others information technology contracts were then extended.

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Subsequent to our review, DHS and DIT informed us that the consultant contracts followed DMB's template for contract terms for time and materials contracts. DHS and DIT also informed us that it has a process to receive and reconcile	The National State Auditors Association recommends that contracts specifically include these terms. In addition, the DMB Administrative Guide policy 0610 states that executive branch departments shall manage their contracts in a manner that is fiscally responsible and assure that vendors meet contractual obligations.	allowing the State to audit the consultant's accounting records to ensure the consultants complied with contract requirements.	denial of payment for unsatisfactory contract services; and the completion of contract tasks and deliverables prior to payment. Further the contracts did not contain liquidated damage provisions: final accentance criteria: and provisions.	 DHS and DIT did not require certain contract terms for all 11 consultant contracts. The consultant contracts did not require the submission of timesheets or invoices for payment; the 	November 2, 2004 through June 1, 2007.	information technology related major. In total, DHS has paid the consultant approximately \$774,000 for the period	experience in the information technology field. DIT maintains that the consultant's mathematics degree is equivalent to an	degree. However, the consultant had previous work	met the educational requirements, we were not provided with	was given full credit in the contract scoring process for having	an associate's degree with 16 semester credit hours in an	either a bachelor's degree with 21 semester credit hours or	requirements stated in the contract. The contract	months for \$2.8 million, but did not add additional tasks and deliverables expected to be performed by 3 of the 4	extended 4 of the 1 year START contracts a total of 144	 DHS and DIT did not modify the statements of work when 3 of 4 consultant contracts were extended DHS and DIT
(B	······································	Timesheets are submitted using the state's time tracking system and are reconciled to each invoice		These "Time and rates and are not			S		F 6	G et		,	Math is considered an information technology-related major.	·	work will be sur	We agree the s

	contractor invoices and that they would with hold	
	payment for unsatisfactory performance. However, contract terms did not allow the withholding of contractor payment for unsatisfactory performance.	
Vendor	that the contracts include a cancellation clause. DHS. DCH, and DIT contracted with EDS to the product of the contracted with EDS to the contracted w	
Xts	project control office. The Bridges project control office. The Bridges project control office develops, monitors, and manages the project schedule and scope for the development and implementation of deliverables. DHS, DCH, and DIT contracted with Deloitte Consulting LLP for the development and implementation of Bridges. We made the following observations:	N/A
	 DHS, DCH, and DIT's contract for development and implementation did not require the completion of all deliverables as a condition for payment. We identified 69 of 96 contract deliverables that were not required to be completed for payment. For example, deliverables for 	We disagree that contract deliverables were not required to be completed for payment because the contract payment approach and schedule were approved by the federal agency overseeing Bridges.
	transition of knowledge to DIT staff and help desk guides are not a condition for payment. The Bridges development and implementation contract was awarded in February 2006 for a total of \$70.0 million.	Many of the deliverables are dependent upon prior milestones being completed. DHS and DIT picked the deliverable at the "end of the chain" as the navocint
	 DHS and DIT, in conjunction with DMB, did not maintain adequate contract documentation. The vendor contract files were missing state site visit notes and had incomplete vendor 	There are two processes that the OAG references in their letter:
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NA		
	Deloite Development & Implementation	Summary
	Simmary of contracts for DMO partitions and	Contract
		Schedules
	•	Rollout
NA	Criair depicting timing of events.	Contract /
	Chart denisting finite of the current fiscal year.	Bridges
g the year	projects and activities undertaken during the previous fiscal year and during the first quarter of the current fiscal year. DHS did not provide the status report to the Legislature by February 1, 2007. DHS informed us that it did not submit the status report because of an oversight. After we brought this to DHS' attention, DHS provided the report to the Legislature. However, the report did not include narrative describing the projects and activities undertaken during the projects.	
status cluding is bmit a s, the ector er of		Reporting
caons of procedefine it lies.	_	Legislative
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5 Questions

1. Is there enough funding for Bridges?

Additional monetary resources may be needed. We are evaluating the needs and looking at changes that may be needed by pilot and subsequent waves. Will report back by 3/12/08

2. What's the new schedule, new timelines

We are targeting a window between June and August to deploy the pilot in Barry-Eaton and Calhoun County Offices. Conditions to meet dates:

- a. No new legislative mandates that affect Legacy systems and Bridges
- b. No new DHS, DCH, DLEG policies that affect the application
- c. Agency and other partners hit their targets
- d. Other "Go-Live" criteria is met
- e. Additional monetary resources may be needed. We are evaluating the needs and looking at changes that may be needed by pilot and subsequent waves. Will report back by 3/12/08

3. Further proof that state law was adhered to when it comes to purchasing and contractors

The DMB Act was followed. All consultant and Bridges contracts were approved by the Administrative Board and all DMB procurement polices that were in place at the time were followed.

Background: In 2004 Purchasing Operations had programs for purchasing IT goods and services in place that included the use of 2 prequalified programs, a full blown RFP, and the ability to award contracts where it was in the best interest of the state. In the case of the consultants in question hired during this time period, 6 of the 7 consultants were granted contracts using the prequalified program called Start (Short Term Augmentation of Resources for Technology), which was designated for procurements that were less than a year in duration and under \$250,000.00. The other consultant was hired as a result of being placed on the critical continuity list that was developed.

The Start program was chosen as a means to purchase these resources as Purchasing Operations was informed that these positions were for planning purposes and their duties would be completed within the year, In 2005, subsequent to and separate from Bridges, DMB and DIT conducted a statewide "Rate Reduction & Critical Project Continuity" effort. This effort concluded with

changes to the START program to extend the duration to 3 years. The Bridges PMO contracts and others information technology contracts were then extended.

As required by law the requests for amendments were presented to the State's Administrative Board for approval which was granted in May of 2005.

4. Information on any potential cost overruns

See questions 1 & 2

5. More clearly defined goals for Bridges

The Cost Benefit Analysis (CBA) as submitted and approved by the federal government contains very specific, quantifiable results (i.e., benefits) to be obtained. They address three areas: increased worker productivity, decreased operational costs (for IT systems), and decreased financial penalties for error (i.e., misissuance) rates.

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- The Cost Benefit Analysis (CBA) as submitted and approved by the federal government contains very specific, quantifiable results (i.e., benefits) to be obtained.
 - They address four areas:
 - Increased worker productivity
 - Modification and routine maintenance will be much more cost effective and timely
 - Decreased financial penalties for error rates (i.e., misissuance).
 - Eliminates high cost error prone manual activity and calculations.
- In addition the current systems used to determine eligibility are over 25 years old and using unsupported technology. It is critical that the business functions processed by these computer applications are migrated to a system that will be sustainable for the next 10 years.